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The Honorable Robert Whaley

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF WASHINGTON

14 THE UNITED STATES OF
15 AMERICA, For the Use and Benefit
16 of CONTRACTORS EQUIPMENT
17 MAINTENANCE COMPANY, INC.,
18 a Washington corporation,

19 Plaintiff,

20 v.

21 BECHTEL HANFORD, INC., a
22 corporation; P.W. STEPHENS
23 CONTRACTORS, INC., a Missouri
24 corporation; ACSTAR Insurance
25 Company, a foreign corporation,

26 Defendants.

No. CV-02-5006-RHW

BHI'S MOTION FOR JUDGMENT

27 Defendant, Bechtel Hanford, Inc. ("BHI") hereby requests the Court for entry of
28 Judgment against United Coastal Insurance Company ("UCIC"), as surety for the
29 Supersedeas Bond on Appeal filed with the Court on or around June 9, 2004. A
30 summary of the requested Judgment is detailed as follows:

For Undertaking Liability of ACSTAR Insurance Company:	
Principal	\$ 282,611.00
Cost Pursuant to Rule 54(d)	\$16,239.56
Post Judgment Interest at 1.18% or \$9.66 per diem Pursuant to 28 U.S.C. §1961 from March 23, 2004 to March 23, 2006	\$7,052.87
Total as of March 23, 2006	\$305,903.43

For Undertaking Liability of P.W. Stephens Contractors, Inc.:	
Attorney's fees	\$296,554.00
Costs	\$19,604.53
Pre-Judgment Interest	\$95,989.35
Post Judgment Interest at 1.18% or \$13.33 per diem Pursuant to 28 U.S.C. §1961 from March 23, 2004 to March 23, 2006	\$9,727.63
Total as of March 23, 2006	\$421,915.51

In brief, as of March 23, 2006, BHI seeks to recover from UCIC the sum of \$727,818.95, plus thereafter, post judgment interest at \$22.99 per diem.

This motion is based on Fed. R. Civ. P. 65.1 and supported by the Declaration of Marisa M. Bavand in Support of Bechtel Hanford, Inc.'s Supplemental Briefing on Attorney's Fees, Cost and Interest, filed on January 30, 2004, and the following pleadings accompanying this motion:

1 1. Memorandum in Support of BHI's Motion for Order Setting Hearing
2 Date and for Judgment,


3 2. Declaration of Marisa M. Bavand, and

4 3. Cost Bill.

5 Dated this 7th day of February, 2006.

7 Respectfully submitted,

8 GROFF MURPHY TRACHTENBERG
9 & EVERARD PLLC

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11 David C. Groff, WSBA #04706
12 Marisa M. Bavand, WSBA #27929

13 *Attorneys for Defendant Bechtel*
14 *Hanford, Inc.*